

HWY 1232



# United States Department of the Interior

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Washington, DC 20240



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Mr. Edwin H. Sniffen  
Division Administrator  
Hawaii Department of Transportation  
869 Punchbowl Street, Room 513  
Honolulu, Hawaii 96813

DEPT OF TRANSPORTATION  
2010 AUG -5 P 2:29  
HIGHWAYS DIVISION

Dear Mr. Sniffen:

The Department of the Interior (Department) has reviewed the Final Environmental Impact Statement and Section 4(f) Evaluation for the **Honolulu High-Capacity Transit Corridor Project, City and County of Honolulu, O'ahu, Hawaii**. The Department offers the following comments for your consideration.

## Section 4(f) Evaluation

### **General Comment:**

There are several instances throughout this document that cite stipulations in the Programmatic Agreement (PA). Consultation on the PA is still underway, and per our July 7, 2010, telephone conversation, there was discussion suggesting changes to the PA. When the PA is executed, the Department would like to verify that what is cited in the Section 4(F) Evaluation regarding the PA is consistent with the executed version.

### **Specific Comments:**

**Page 5-12; column 1, last paragraph:** The archeological inventory survey that was conducted for the first construction phase area between East Kapolei and Pearl Highlands, states that a subsurface deposit was identified and the integrity of the deposit evaluated; however, it appears that the process for evaluating the deposit was incomplete. The *National Register Bulletin 36: Guidelines for evaluating and Registering Archeological Properties* states:

The evaluation of integrity . . . must always be grounded in an understanding of a property's physical features and how they relate to its significance. The retention of specific aspects of integrity is paramount for a property to convey its

significance. Determining which of these aspects are most important to a particular property requires knowing why, where, and when the property is significant. The importance of each of these aspects of integrity depends upon the nature of the property and the Criterion or Criteria under which it is being nominated (NR Bulletin 36, p35).

The evaluation of the site, as described in the Section 4(f) Evaluation, did not identify the Criterion or Criteria of significance and only seemed to assess the integrity without consideration of the significance. Proper methods of evaluating the significance and integrity of archeological sites need to be followed throughout this project. The Department would appreciate verification on how the site was evaluated.

**Page 5-53; column 1, lines 5 & 6 and Figure 5-38:** The referenced figure 5-38 does not support the statement in the text that "the excellent make views will not be obstructed." The simulation in figure 5-38 actually shows that the views are significantly obstructed.

**Page 5-53; column 2, paragraphs 1 & 2:** The lack of any plan or visual simulation makes it difficult to understand how it is that the construction in this area will have no visual effect on the two bridges. From the description, it seems that Farrington Highway is between and at a lower elevation than the pair of bridges. The guideway will be constructed 40 feet above the median of Farrington Highway. Gauging from the existing conditions photo, the guideway would fall vertically within the vertical space that now visually separates the highway from the bridges. This suggests that there would be a significant visual impact to the bridge. A simulation should be included in the document to show the impact.

**Page 5-58; column 1. paragraphs 4:** The USS Bowfin and the USS Arizona are both mentioned as being within the boundary of the US Naval Base Pearl Harbor National Historic Landmark (NHL). However, the fact that the USS Bowfin and USS Arizona are also NHL sites is omitted. The USS Utah is not mentioned; however, it too lies within the boundary of US Naval Base Pearl Harbor NHL.

**Page 5-60; column 1, paragraph 1; and P 5-61; column 1 paragraph 3:** Paragraph one on page 5-60 includes the statement that "... the guideway will not eliminate primary views of this historic district nor alter its relationship to the water since the guideway and the stations will be on the mauka side of the busy highway." Paragraph 3 on page 2-61 states that the elevated guideway will not substantially affect primary views of this architectural features complex." The 2008 *Final Integrated Cultural Resources Management Plan for All Navy Properties on the Island of Oahu* identifies significant historic views from the Makalapa Housing Area to the main base:

**b. Views and Vantage Points**

The site of the Makalapa Crater housing was chosen for officers' quarters because it was the only distinct elevation in the immediate vicinity of Pearl Harbor (CPNAB n.d: A 915). Its topography permits expansive views to shoreline

facilities and waters of the Pearl Harbor Naval Complex, particularly from the officers' quarters along the rim. Views of the Wai'anae mountain range to the west and the Ko'olau range to the east are also available from some houses. Mature tree cover and fence along Kamehameha Highway now block views from many houses. (pp. 265-266; also see Fig. 3 on p 275).

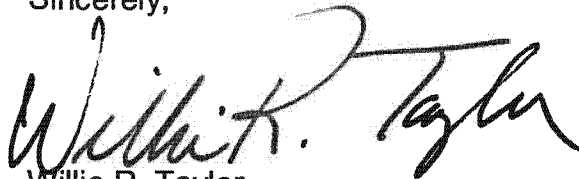
These historic views are not acknowledged in the Section 4(f) Evaluation nor does the document demonstrate, either through a site section or via a simulation, that these views are not blocked by the new construction. If they are blocked, then this should be acknowledged in the Section 4(f) Evaluation.

#### **Section 6(f) Evaluation**

The Section 4(f) Evaluation correctly identified two existing Section 6(f) properties within the project's APE. Neither site will be impacted by any of the proposed alternatives.

We appreciate the opportunity to provide these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Willie R. Taylor". The signature is fluid and cursive, with the first name "Willie" being more prominent than the last name "Taylor".

Willie R. Taylor  
Director, Office of Environmental  
Policy and Compliance